



24 March 2017

TO: Sika Pence <sitkapence@fs.fed.us>,
Kris Stein <krisstein@fs.fed.us>,
Tom Montoya tmontoya@fs.fed.us

CC: Rob Klavins

Subject: Lostine Corridor Project

Dear Sitka, Kris, & Tom:

Please accept the following comments from Oregon Wild concerning the Lostine Corridor Project. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy.

Since your last communication with Rob Klavins regarding the possibility of a collaborative process, we have heard through the grapevine that the Forest Service intends to go forward with the Lostine Project and forgo additional and repeatedly promised public involvement. We hope that is not the case and stand ready to work with you on an EA or EIS, and collaborative process that can lead to a good outcome for all parties.

First and foremost, we have concerns that various substantive requirements of the LRMP and the Lostine Wild & Scenic River Plan are not being followed. Some of these are explained in our March 10, 2016 scoping comments. Consistent with the APA, compliance with these requirements should be clearly documented by the agency.

When we wrote our scoping comments we expected to be presented with additional opportunities to participate in an EA or the collaborative development of a project that never occurred. We see that the website has been updated with substantial new analysis from specialist but we were not notified of the availability of that analysis or asked to comment on it. We would like to review and comment on that analysis but we don't know if it would be a wasted effort because the FS could make a final decision any day, while we are still working on comments. This highlights the problem with CEs and taking shortcuts with public process.

We are not satisfied that procedural requirements are being faithfully followed. NEPA and collaborative processes are incomplete. There are a number of extraordinary circumstances that

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render a Categorical Exclusion inappropriate. These indicators of significance and extraordinary circumstances include: proximity to wilderness, wild & scenic river, habitat for 3 species of Threatened fish, habitat for other sensitive wildlife like bald eagles and peregrine falcons, unique recreation areas, cultural resources, public safety, rare plants, controversy exists regarding the best way to harmonize trade-offs, potential violations of the LRMP and the WSR Plan, etc. It seems obvious to us that resolving trade-offs can best be conducted in an EA or EIS that weighs different alternatives and fully considers all the potentially significant effects.

Additionally, we are concerned that the record may be incomplete as we made a number of our substantive comments orally. Has the Forest Service maintained a record of oral comments it has received? Those communications include (but are not limited to) the following – expressions from stakeholders that they have not received consistent, honest, and timely information about the process, substance, or need for the project, that we and others have not been provided an opportunity to engage in a collaborative process, that we and others have not been treated equitably or professionally, that the project threatens unique values, the project overreaches by including unnecessary components such as commercial logging while ignoring other legitimate safety and/or forest health issues, targets the wrong stands and the wrong trees, overstates risks, does not comport with the stated purpose and need, ignores important analysis, ignores some stakeholder groups entirely, runs counter to the best available science, and underestimates negative impacts of the project proposal (to the extent we have understood it at various times).

We trust that you have heard similar concerns from a number of other stakeholders regarding the process, substance, and inconsistent/inaccurate/conflicting information associated with this project.

We hope the Forest Service will give serious consideration to its current course of action on this project and implement a project that can have broad support and build trust. As ever, we stand ready to look forward and participate in such a process if it is presented to us.

Sincerely,

A handwritten signature in black ink that reads "Doug Heiken". The signature is written in a cursive, flowing style.

Doug Heiken

dh@oregonwild.org